

EXECUTIVE OFFICER'S SUMMARY REPORT
9:00 a.m., October 12, 2005
North Coast Regional Water Board
Hearing Room
5550 Skylane Boulevard, Suite A
Santa Rosa, California

ITEM: _____

SUBJECT: Modification of Waste Discharge Requirements Order No. R1-2003-0009
(NPDES Permit No. CA0023078) for Fort Bragg Municipal Improvement District
No. 1 Wastewater Treatment Facility, WDID No. 1B84083OMEN

PURPOSE OF ITEM

Regional Water Board staff propose modification of the NPDES Permit for Fort Bragg Municipal Improvement District No. 1 Wastewater Treatment Facility. The proposed changes include permit recognition of a treatment process alternation and minor modifications of the Monitoring and Reporting Program to correct errors in requirements for whole effluent toxicity monitoring.

DISCUSSION

The Fort Bragg Municipal Improvement District No. 1 (hereinafter Discharger) operates a municipal wastewater treatment facility (WWTF) located in the City of Fort Bragg to collect, treat, and dispose of wastewater generated within the sewerage district. The Discharger treats domestic waste to secondary standards, disinfects the wastewater using chlorine, and then discharges the treated effluent to the Pacific Ocean through an ocean outfall. The Discharger is currently regulated under Waste Discharge Requirements Order No. R1-2004-0009 (Order No. R1-2004-0009), adopted by the Regional Water Board on March 24, 2004.

Regional Water Board staff are proposing the following modifications to Waste Discharger Requirements Order No. R1-2004-0009:

Recognition of Chemical Addition System

The Discharger has installed and optimized a chemical treatment system to improve effluent quality to the extent that the permitted discharge is consistently in compliance with effluent limitations for biochemical oxygen demand (BOD) and suspended solids. In a letter to the Regional Water Board Executive Officer (Executive Officer), dated October 26, 2004 (Attachment 1), the Discharger requested modification of its existing NPDES permit to recognize this operational change. The tentative permit modification, proposed in accordance with 40 CFR 122.62 for material and substantial alterations or additions to the permitted facility,

would formally incorporate the chemical addition system as a permitted component of the Discharger's wastewater treatment system.

Whole Effluent Toxicity Monitoring Requirements

Order No. R1-2004-0009 does not include effluent limitations for effluent toxicity. However, the permit contains numerical triggers that, if exceeded, require the Discharger to initiate accelerated effluent toxicity monitoring and a Toxicity Reduction Evaluation (TRE). The numerical triggers were derived using an adaptation of the methodology described in Box 3-2 of the U.S. EPA's Technical Support Document for Water Quality-based Toxics Control (TSD) to determine reasonable potential. A technical mistake was made in choosing the appropriate confidence level to use in the calculation of the numerical trigger. The proposed permit modification revises the numerical triggers that result from using a more appropriate confidence level and modifies the specified dilution series to better bracket the revised numerical triggers.

This Permit modification is governed by 40 CFR 122.44(l)(1), which provides that less stringent effluent conditions are permitted where the circumstances justifying permit modification under 40 CFR 122.62 are present. Among the several enumerated grounds is that, as provided in Section 122.62(a)(15), a modification is needed to "correct technical mistakes, such as errors in calculation, or mistaken interpretations of law made in determining permit conditions."

PRELIMINARY STAFF

RECOMMENDATION: Modify Waste Discharge Requirements Order R1-2003-0009 for the Fort Bragg Municipal Improvement District No. 1 WWTP